

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking Regarding the Implementation of the Suspension of Direct Access Pursuant to Assembly Bill 1X and Decision 01-09-060

Rulemaking 02-01-011
(January 9, 2002)

**COMMENTS OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
ON THE PROPOSED DECISION OF
ADMINISTRATIVE LAW JUDGE PULSIFER
ON PROPOSED
COST RESPONSIBILITY SURCHARGE EXEMPTION PROTOCOLS**

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April 23, 2007

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In accordance with the notice provided by the Chief Administrative Law Judge, dated April 3, 2007, and pursuant to the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), the California Municipal Utilities Association (“CMUA”) provides the following comments on the proposed decision of Administrative Law Judge (“ALJ”) Pulsifer (“Proposed Decision”).

The Proposed Decision addresses a petition filed by Pacific Gas and Electric Company (“PG&E”) on behalf of itself and the other two investor-owned utilities. PG&E’s petition to modify D.06-07-030 seeks the Commission’s approval of protocols for administering the Cost Responsibility Surcharge (“CRS”) exemptions for certain new Municipal Departing Load (“MDL”) customers. CMUA’s comments address a single aspect of the Proposed Decision that should be modified. It is unclear from the Proposed Decision whether or not the Commission is saying that CRS exemptions will *automatically* apply to certain MDL customers irrespective of the fact that such customers (or the publicly owned utilities serving these customers) never made a one-time election to claim any such exemptions. Such a conclusion would be wrong because it is inconsistent with previous Commission decisions and with principles supporting these decisions. The Proposed Decision should be modified to resolve this ambiguity.

On the one hand, the Proposed Decision states that the Commission “did not mandate that the exemption apply automatically, nor as a default in the event an entity took no action to claim it.”¹ Moreover, the Proposed Decision states that this “option to elect whether or not to apply for such exemption on a one-time basis” is “consistent with prior framework for establishing the CRS exemptions....”² Accordingly, the Proposed Decision appears to be agreeing with CMUA that all eligible categories of MDL customers should have the one-time option to elect to utilize the CRS exemptions.³ However, the Proposed Decision also states that “other departing load customers who have already been determined to be exempt from DWR power cost responsibility should not be permitted to elect an option to be subject to the DWR power charge.”⁴ Accordingly, there is ambiguity in the Proposed Decision as to whether or not an eligible *transferred* MDL customer, for example, may make choose not to apply the CRS exemptions.

At the core of this ambiguity is what could be read as the Proposed Decision’s apparent belief that there are certain MDL customers who have “*already* been determined to be exempt from DWR power cost responsibility....”⁵ In this regard, the Proposed Decision could be read as saying that there are certain MDL customers who do not get to make a one-time choice as to the applicability of the CRS exemptions, but rather such exemptions are automatically applied to these customers, irrespective of the economic consequences. This interpretation is unreasonable, principally because it flatly contradicts what the Proposed Decision says elsewhere, namely, “[g]ranting *each customer* a one-time choice as to whether to utilize the exemption is reasonable

¹ Proposed Decision at 8; Finding of Fact 6.

² *Id.*; Finding of Fact 7.

³ *See, e.g., id.* at 5. (“As noted by CMUA, we have previously characterized the CRS exemption as applying on a first-come, first-served basis to MDL entities that were eligible to apply for it.”).

⁴ *Id.* *See also, id.* at 9; Conclusion of Law 5 (“The option to elect to change existing CRS exemptions should not be granted to other departing load customers for whom DWR power charge exemptions have already been determined.”).

⁵ *See* note 4, above (emphasis added).

and *consistent* with how *previous Commission decisions* have characterized the nature of the CRS exemption.”⁶ Because of the opportunity for mischief in applying this potentially ambiguous language, CMUA urges the Commission to revise the Proposed Decision, as generally set forth in Appendix A to these comments.

CMUA accepts, with one qualification, that “[o]nce a customer makes the [exemption] election, the customer should be held responsible for the results of that election, irrespective of how costs and market conditions may change over time.”⁷ However, the customer (or the publicly owned utility on behalf of the customer) must be allowed to make a one-time election, and should not be forced to have the determination involuntarily applied. CMUA is unaware of any departing load customer who has “*already been determined* to be exempt from DWR power cost responsibility....”⁸ Even as to transferred MDL of a publicly owned utility named in the PG&E Bypass Report, CMUA is unaware of any publicly owned utility that has specified the applicability of any exemptions. As noted in the Commission-adopted protocols for administering transferred MDL CRS exemptions, and as described further below, such specification by entities named in the PG&E Bypass Report is the starting point.⁹

While publicly owned utilities named in the PG&E Bypass Report have “priority” in the allocation of exemptions for transferred MDL, the exemptions are not involuntarily applied or allocated; affirmative action is required by the publicly owned utility.¹⁰ The publicly owned utilities

⁶ Proposed Decision at 4 (emphasis added).

⁷ *Id.* at 6. As CMUA argued in its response to PG&E’s petition to modify, CMUA believes that a New Party who occupies the premises of a departing MDL customer should also be entitled to make the election and should not be bound by the billing determination of the prior customer.

⁸ See note 4, above (emphasis added).

⁹ See D.06-07-030; Appendix 4 (emphasis added) (“For transferred load, the PG&E Bypass Report shall serve as the *starting point* for listing the individual POUs that are *eligible* for the ‘first tier’ exemptions, and for specifying the total amount of transferred load for which load served by the POUs *may* be exempted from paying specified CRS charges.”).

¹⁰ See *id.* at 45.

named in the PG&E Bypass Report must “specify” the transferred MDL exemptions, if any, that are being applied for the previous calendar year(s).¹¹ This is a voluntary act, not a predetermined outcome. After the publicly owned utilities named in the PG&E Bypass Report have exercised or chosen not to exercise their “priority” right to specify exemptions, then other publicly owned utilities *may* specify the applicability of any residual exemptions: “[N]on-bypass report POUs’...*may* notify the Energy Division of *their interest* in the available unused exemptions....”¹² Again, the action is voluntary, not predetermined.

Any suggestion that publicly owned utilities named in the PG&E Bypass Report (or their customers) do not get to make an affirmative, one-time election as to whether or not to apply the DWR Power Charge exemption is flatly wrong. In no unequivocal terms, the Commission has previously concluded that “[t]he MDL CRS exception should be applied first to those irrigation districts and/or municipalities that were identified *in the Bypass Report*. Any portion of the exception that is not *claimed* should be available to other MDL entities....”¹³ The exemption must be “*claimed*” or “*specified*” by publicly owned utilities named in the PG&E Bypass Report, which is to say that an affirmative choice must be made with respect to the exemption; it cannot be determined or deemed to apply. Likewise, beyond just the publicly owned utilities named in the PG&E Bypass Report, the Commission has determined that all other *transferred* MDL should likewise have a choice as to whether the exemption is applicable: “To the extent that any ‘*transferred load*’ CRS exception that remains available that is *not otherwise utilized* by the *entities identified in PG&E’s Bypass Report*, these and other MDL entities *may seek to apply for*

¹¹ See D.06-07-030; Appendix 4 (step #1).

¹² *Id.* (step #2 and #3).

¹³ D.04-11-014 at 57; Conclusion of Law 9 (emphasis added).

such exception if they are among those entities that meet the criteria identified below.”¹⁴ As noted above, Appendix 4 to D.06-07-030 affirmed this same view.¹⁵

In summary, the Proposed Decision should be modified, as generally described in Appendix A to these comments, in order to remove potential ambiguity regarding the one-time choice afforded *all* MDL customers as to whether to apply the CRS exemptions.

CMUA appreciates the opportunity to comment on the Proposed Decision.

Dated: April 23, 2007

Respectfully submitted,



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¹⁴ *Id.* at 42 (emphasis added).

¹⁵ *See* note 12, above.

Appendix A

Proposed Modifications to the Proposed Decision

As noted by CMUA, we have previously characterized the CRS exemption as applying on a first-come, first-served basis to MDL entities that were eligible to apply for it. Thus, we did not mandate that the exemption apply automatically, nor as a default in the event an entity took no action to apply for it. Rather, we required that each MDL entity take affirmative steps to apply for and be granted the CRS exemption. We characterized the MDL exemption in this manner based on the assumption that those entities subject to the exemption would pay less than those without the exemption. Nonetheless, we did not adopt the rules governing the applicability of the exemption contingent upon a specific level of CRS or only where the exemption results in a lower overall charge. Therefore, although under current market conditions, the exemption may have effects on customers' bills that were unanticipated at the time that we originally adopted the exemptions and rules for applying them, such unanticipated effects do not invalidate the rules originally established for applying the exemptions. Accordingly, each MDL customer eligible for the exemption shall have the option to elect whether or not to apply for such exemption.

We authorize this one-time opportunity to make the election concerning the CRS exemption ~~only~~ to those MDL customers that are served by POU as "new load" subject to the 80 MW cap. The one-time election is warranted for such customers as part of the initial establishment of protocols to identify and administer applicable CRS exemptions.

~~We agree with PG&E, however, that other departing load customers who have already been determined to be exempt from DWR power cost responsibility should not be permitted to elect an option to be subject to the DWR power charge.~~ The principles previously applied concerning

election regarding the CRS exemption should be granted the discretion to change the previous customer's election.

9. When a customer vacates premises and a successor customer moves into those same premises, the successor customer typically becomes subject to the same terms, conditions, and rates prescribed by the tariff that applied to the former customer.

Conclusions of Law

1. The Petition for Modification of D.06-07-030 of PG&E et al. for adoption of protocols for administering the New MDL exemptions should be adopted to the extent authorized below.

2. The clarifying revisions proposed by CMUA applicable to Footnote #2 and Step # 6 of the Protocols should be adopted as reasonable. The effective date for the POU to submit its estimate of new load for 2007 should be extended to May 1, 2007, since the Commission decision adopting these protocols will take effect after the date originally proposed of March 1, 2007.

3. The protocols as set forth in the appendix to this order are reasonable and should be adopted.

4. A one-time election as to whether to claim the DWR Power Charge exemption should be made available to MDL customers served as "new load" subject to the 80 MW cap.

~~5. The option to elect to change existing CRS exemptions should not be granted to other departing load customers for whom DWR power charge exemptions have already been determined.~~

~~6.5.~~ MDL customers should not be permitted to repeatedly switch back and forth in their exemption status during future periods after an election

CERTIFICATE OF SERVICE

I certify that the following is true and correct:

On April 23, 2007, I caused to be served an electronic copy of the attached:

**Comments Of The California Municipal Utilities Association
On The Proposed Decision Of Administrative Law Judge Pulsifer
On Proposed Cost Responsibility Surcharge Exemption Protocols**

on all known parties to R.02-01-011, or their attorneys of record, for whom an e-mail address has been provided. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 23rd day of April, 2007, at Sacramento, California.

A handwritten signature in black ink, appearing to read "Vicki Ferguson", with a long horizontal flourish extending to the right.

Vicki Ferguson

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0201011 - PUC - DIRECT ACCESS
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